

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No.: CR 14-0196 CRB
)	
Plaintiff,)	
)	SPECIAL VERDICT FORM
v.)	
)	
KWOK CHEUNG CHOW,)	
a/k/a "Raymond Chow,")	
a/k/a "Ha Jai,")	
a/k/a "Shrimpboy,")	
)	
Defendant.)	

We the jury, find:

COUNT ONE

1A. Kwok Cheung Chow _____ of conspiring to conduct or to participate in the
(guilty or not guilty)
conduct of the affairs of an enterprise through a pattern of racketeering, in violation of 18 U.S.C.
1962(d).

If you find Kwok Cheung Chow not guilty of Count One, skip paragraph 1B, below, and go directly to
paragraph 2 on the next page. If, on the other hand, you find Kwok Cheung Chow guilty of Count One,
then go to paragraph 1B, below.

1B. We further find that Kwok Cheung Chow agreed and understood that the pattern of
racketeering for the racketeering conspiracy charged in Count One would include either murder, or
conspiracy to commit murder, or both.

Write either "Yes" or "No" in each of the spaces provided.

MURDER

CONSPIRACY TO
COMMIT MURDER

COUNT TWO

2. Kwok Cheung Chow _____ of the murder of Allen Leung in aid of
(guilty or not guilty)
racketeering, in violation of 18 U.S.C. § 1959(a)(1).

COUNT THREE

3. Kwok Cheung Chow _____ of violent crime in aid of racketeering - conspiracy
(guilty or not guilty)
to murder Jim Tat Kong , in violation of 18 U.S.C. § 1959(a)(5).

COUNTS FOUR THROUGH 133

4-133. Kwok Cheung Chow _____ of laundering of funds represented to be the proceeds
(guilty or not guilty)
of a specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(3) for each of the offenses listed
below. For each listed offense, please mark an X in either the column titled "Guilty" or the column
titled "Not guilty". Do not mark an X in both columns for the same count.

Count	Date	Amount	Description of Transaction	Guilty	Not guilty
4	3/19/11	\$22,000	Receipt of \$22,000 in cash by Kevin SIU		
5	3/19/11	\$22,000	Receipt of \$22,000 in cash by George NIEH		
6	3/25/11	\$20,000	Payment of \$20,000 check by NIEH		
7	3/25/11	\$20,000	Wire transfer \$20,000 by SIU		
8	4/12/11	\$44,000	Receipt of \$44,000 in cash by SIU		
9	4/13/11	\$44,000	Receipt of \$44,000 in cash by NIEH		
10	4/20/11	\$15,000	Payment of \$15,000 check by NIEH		
11	4/20/11	\$15,000	Payment of \$15,000 check by NIEH		
12	4/20/11	\$10,000	Payment of \$10,000 check by NIEH		
13	4/25/11	\$40,000	Wire transfer of \$40,000 by SIU		
14	5/4/11	\$66,000	Receipt of \$66,000 in cash by NIEH		
15	5/9/11	\$20,000	Payment of \$20,000 check by NIEH		
16	5/11/11	\$20,000	Payment of \$20,000 check by NIEH		
17	5/13/11	\$20,000	Payment of \$20,000 check by NIEH		
18	5/26/11	\$110,000	Receipt of \$110,000 in cash by NIEH		
19	5/26/11	\$55,000	Receipt of \$50,000 in cash by SIU		
20	6/1/11	\$25,000	Payment of \$25,000 check by NIEH		
21	6/1/11	\$25,000	Payment of \$25,000 check by NIEH		
22	6/2/11	\$50,000	Wire transfer of \$50,000 by SIU		
23	6/3/11	\$25,000	Payment of \$25,000 check by NIEH		
24	6/7/11	\$25,000	Wire transfer of \$25,000 by NIEH		
25	6/16/11	\$110,000	Receipt of \$110,000 in cash by NIEH		
26	6/16/11	\$66,000	Receipt of \$66,000 in cash by SIU		
27	6/22/11	\$25,000	Payment of \$25,000 check by NIEH		
28	6/22/11	\$25,000	Payment of \$25,000 check by NIEH		
29	6/22/11	\$60,000	Wire transfer of \$60,000 by SIU		
30	6/24/11	\$25,000	Payment of \$25,000 check by NIEH		
31	6/24/11	\$25,000	Payment of \$25,000 check by NIEH		
32	7/14/11	\$132,000	Receipt of \$132,000 in cash by NIEH		
33	7/20/11	\$30,000	Payment of \$30,000 check by NIEH		
34	7/20/11	\$30,000	Payment of \$30,000 check by NIEH		
35	7/23/11	\$30,000	Payment of \$30,000 check by NIEH		
36	7/23/11	\$30,000	Payment of \$30,000 check by NIEH		
37	8/1/11	\$110,000	Receipt of \$110,000 in cash by NIEH		
38	8/1/11	\$33,000	Receipt of \$33,000 in cash by Alan CHIU		
39	8/5/11	\$8,000	Payment of \$8,000 check by CHIU		
40	8/5/11	\$8,000	Payment of \$9,000 check by CHIU		
41	8/5/11	\$8,000	Payment of \$7,000 check by CHIU		
42	8/9/11	\$30,000	Payment of \$30,000 check by NIEH		
43	8/9/11	\$20,000	Payment of \$20,000 check by NIEH		
44	8/11/11	\$30,000	Payment of \$30,000 check by NIEH		
45	8/11/11	\$20,000	Payment of \$20,000 check by NIEH		

Count	Date	Amount	Description of Transaction	Guilty	Not guilty
46	8/17/11	\$6,000	Payment of \$6,000 check by CHIU		
47	9/22/11	\$132,000	Receipt of \$132,000 in cash by NIEH		
48	9/22/11	\$66,000	Receipt of \$66,000 in cash by CHIU		
49	9/29/11	\$30,000	Payment of \$30,000 check by NIEH		
50	9/29/11	\$30,000	Payment of \$30,000 check by NIEH		
51	10/1/11	\$30,000	Payment of \$30,000 check by NIEH		
52	10/1/11	\$30,000	Payment of \$30,000 check by NIEH		
53	10/4/11	\$60,000	Wire transfer of \$60,000 by CHIU		
54	10/19/11	\$132,000	Receipt of \$132,000 in cash by NIEH		
55	10/19/11	\$44,000	Receipt of \$44,000 in cash by CHIU		
56	10/24/11	\$40,000	Wire transfer of \$40,000 by CHIU		
57	10/28/11	\$30,000	Payment of \$30,000 check by NIEH		
58	10/28/11	\$30,000	Payment of \$30,000 check by NIEH		
59	10/31/11	\$30,000	Payment of \$30,000 check by NIEH		
60	10/31/11	\$30,000	Payment of \$30,000 check by NIEH		
61	11/17/11	\$88,000	Receipt of \$88,000 in cash by NIEH		
62	11/23/11	\$20,000	Payment of \$20,000 check by NIEH		
63	11/23/11	\$20,000	Payment of \$20,000 check by NIEH		
64	11/25/11	\$20,000	Payment of \$20,000 check by NIEH		
65	11/25/11	\$20,000	Payment of \$20,000 check by NIEH		
66	12/13/11	\$88,000	Receipt of \$88,000 in cash by NIEH		
67	12/13/11	\$22,000	Receipt of \$22,000 in cash by CHIU		
68	12/21/11	\$20,000	Wire transfer of \$20,000 by CHIU		
69	12/21/11	\$20,000	Payment of \$20,000 check by NIEH		
70	12/21/11	\$20,000	Payment of \$20,000 check by NIEH		
71	12/23/11	\$20,000	Payment of \$20,000 check by NIEH		
72	12/23/11	\$20,000	Payment of \$20,000 check by NIEH		
73	1/25/12	\$77,000	Receipt of \$77,000 in cash by NIEH		
74	2/3/12	\$35,000	Payment of \$35,000 check by NIEH		
75	2/3/12	\$35,000	Payment of \$35,000 check by NIEH		
76	2/13/12	\$66,000	Receipt of \$66,000 in cash by NIEH		
77	2/13/12	\$22,000	Receipt of \$22,000 in cash by CHIU		
78	2/21/12	\$20,000	Wire transfer of \$20,000 by CHIU		
79	2/17/12	\$30,000	Payment of \$30,000 check by NIEH		
80	2/17/12	\$30,000	Payment of \$30,000 check by NIEH		
81	4/19/12	\$77,000	Receipt of \$77,000 in cash by NIEH		
82	4/27/12	\$35,000	Payment of \$35,000 check by NIEH		
83	4/27/12	\$35,000	Payment of \$35,000 check by NIEH		
84	5/10/12	\$66,000	Receipt of \$66,000 in cash by NIEH		
85	5/17/12	\$30,000	Payment of \$30,000 check by NIEH		
86	5/17/12	\$30,000	Payment of \$30,000 check by NIEH		
87	5/16/12	\$33,000	Receipt of \$33,000 in cash by YUN		
88	5/22/12	\$30,000	Wire transfer of \$30,000 by YUN		
89	6/20/12	\$66,000	Receipt of \$66,000 in cash by NIEH		
90	6/20/12	\$66,000	Receipt of \$66,000 in cash by YUN		
91	6/22/12	\$20,000	Payment of \$20,000 check by YUN		
92	6/28/12	\$30,000	Payment of \$30,000 check by NIEH		
93	6/28/12	\$30,000	Payment of \$30,000 check by NIEH		
94	6/26/12	\$20,000	Wire transfer of \$20,000 by YUN		
95	6/27/12	\$10,000	Wire transfer of \$10,000 by YUN		
96	6/27/12	\$10,000	Wire transfer of \$10,000 by YUN		
97	8/16/12	\$66,000	Receipt of \$66,000 in cash by NIEH		

SPECIAL VERDICT FORM

CR 14-0196 CRB

Count	Date	Amount	Description of Transaction	Guilty	Not guilty
98	8/16/12	\$66,000	Receipt of \$66,000 in cash by YUN		
99	8/22/12	\$18,000	Payment of \$18,000 check by PAU		
100	8/24/12	\$30,000	Payment of \$30,000 check by NIEH		
101	8/24/12	\$30,000	Payment of \$30,000 check by NIEH		
102	8/27/12	\$15,000	Payment of \$15,000 check by YUN		
103	8/31/12	\$17,000	Payment of \$17,000 check by YUN		
104	9/4/12	\$10,000	Payment of \$10,000 check by YUN		
105	10/11/12	\$66,000	Receipt of \$66,000 in cash by NIEH		
106	10/11/12	\$66,000	Receipt of \$66,000 in cash by YUN		
107	10/11/12	\$12,000	Payment of \$12,000 check by YUN		
108	10/12/12	\$15,000	Payment of \$15,000 check by YUN		
109	10/17/12	\$15,000	Payment of \$15,000 check by YUN		
110	10/19/12	\$9,000	Payment of \$9,000 check by YUN		
111	10/19/12	\$30,000	Payment of \$30,000 check by NIEH		
112	10/19/12	\$30,000	Payment of \$30,000 check by NIEH		
113	10/24/12	\$9,000	Payment of \$9,000 check by YUN		
114	12/12/12	\$77,000	Receipt of \$77,000 in cash by NIEH		
115	12/19/12	\$20,000	Payment of \$20,000 check by NIEH		
116	12/21/12	\$20,000	Payment of \$20,000 check by NIEH		
117	12/21/12	\$10,000	Wire transfer of \$10,000 by NIEH		
118	12/21/12	\$20,000	Two wire transfers of \$10,000 each by NIEH		
119	2/14/13	\$88,000	Receipt of \$88,000 in cash by NIEH		
120	2/22/13	\$20,000	Payment of \$20,000 check by NIEH		
121	2/22/13	\$20,000	Payment of \$20,000 check by NIEH		
122	2/26/13	\$20,000	Wire transfer of \$20,000 by NIEH		
123	2/26-28/13	\$20,000	Two wire transfers of \$10,000 each by NIEH		
124	4/11/13	\$77,000	Receipt of \$77,000 by NIEH		
125	4/11/13	\$33,000	Receipt of \$33,000 by YUN		
126	4/12/13	\$9,000	Payment of \$9,000 check by YUN		
127	4/17/13	\$12,000	Payment of \$12,000 check by YUN		
128	4/19/13	\$9,000	Payment of \$9,000 check by YUN		
129	4/19/13	\$35,000	Payment of \$35,000 check by NIEH		
130	4/19/13	\$35,000	Payment of \$35,000 check by NIEH		
131	6/13/13	\$77,000	Receipt of \$77,000 in cash by NIEH		
132	6/22/13	\$35,000	Payment of \$35,000 check by NIEH		
133	6/22/13	\$35,000	Payment of \$35,000 check by NIEH		

COUNT 134

134. Kwok Cheung Chow _____ of conspiring between December 13, 2011, and
(guilty or not guilty)
March 13, 2011 to either receive, possess, store, sell, or dispose of stolen property, specifically 50 cases
of Hennessey XO alcohol, across state lines, OR to transport, transmit, or transfer said stolen property to
a location outside the United States, OR BOTH, with all of you agreeing unanimously on one or both of
the objects of the conspiracy.

COUNT 135

135. Kwok Cheung Chow _____ of conspiring between June 20, 2012, and
(guilty or not guilty)
September 19, 2012, to receive, possess, store, sell, or dispose of stolen property, specifically 27 cases
of Johnnie Walker Blue Label alcohol, across state lines.

COUNT 136

136. Kwok Cheung Chow _____ of conspiring between July 19, 2012, and
(guilty or not guilty)
August 16, 2012, to either receive, possess, store, sell, or dispose of stolen property, specifically more
than 10,000 cigarettes, across state lines, OR to possess, receive, sell, distribute or purchase more than
10,000 contraband cigarettes, OR BOTH, with all of you agreeing unanimously on one or both of the
objects of the conspiracy.

COUNT 137

137. Kwok Cheung Chow _____ of conspiring between December 17, 2012, and
(guilty or not guilty)
January 16, 2013, either to receive, possess, store, sell, or dispose of stolen property, specifically more
than 10,000 cigarettes, across state lines, OR to possess, receive, sell, distribute or purchase more than
10,000 contraband cigarettes, OR BOTH, with all of you agreeing unanimously on one or both of the
objects of the conspiracy.

COUNT 138

138. Kwok Cheung Chow _____ of conspiring between June 19, 2013, and July 23,
(guilty or not guilty)
2013, either to receive, possess, store, sell, or dispose of stolen property, specifically more than 10,000
cigarettes, across state lines, OR to possess, receive, sell, distribute or purchase more than 10,000
contraband cigarettes, OR BOTH, with all of you agreeing unanimously on one or both of the objects of
the conspiracy.

COUNTS 139 THROUGH 162

139-162. Kwok Cheung Chow _____ of laundering the proceeds of a specified unlawful
(guilty or not guilty)
activity, in violation of 18 U.S.C. § 1956(a)(1) for each of the offenses listed below. For each listed
offense, please mark an X in either the column titled "Guilty" or the column titled "Not guilty". Do not
mark an X in both columns for the same count.

Count	Date	Amount	Description of Transaction	Guilty	Not guilty
139	5/13/13	\$99,275	Delivery of \$99,275 by Norge MASTRANGELO		
140	5/14/13	\$96,275	Receipt of \$96,275 by Albert NHINGSAVATH		
141	8/9/13	\$93,870	Delivery of \$93,870 in cash by Serge GEE		
142	8/11/13	\$90,180	Receipt of \$90,180 by GEE and Elaine LIANG		
143	8/26/13	\$155,900	Delivery of \$155,900 in cash by GEE		
144	8/27/13	\$149,900	Receipt of \$149,900 in cash by GEE and LIANG		
145	9/3/13	\$76,030	Delivery of \$76,030 in cash by unindicted co-conspirators		
146	9/6/13	\$73,000	Receipt of \$73,000 in cash by GEE		
147	9/9/13	\$203,000	Delivery of \$203,000 in cash by unindicted co-conspirators		
148	9/10/13	\$195,000	Receipt of \$195,000 in cash by GEE and LIANG		
149	9/16/13	\$107,400	Delivery of \$107,400 in cash by unindicted co-conspirators		
150	9/18/13	\$103,100	Receipt of \$103,100 in cash by GEE and LIANG		
151	9/26/13	\$145,020	Delivery of \$145,020 in cash by unindicted co-conspirators		
152	9/26/13	\$139,200	Receipt of \$139,200 by LIANG		
153	10/1/13	\$189,780	Delivery of \$189,780 by Gary Kwong Yiu CHEN		
154	10/1/13	\$182,110	Receipt of \$182,110 by GEE and Anthony LAI		
155	10/4/13	\$150,000	Delivery of \$150,000 in cash by GEE		
156	10/8/13	\$144,000	Receipt of \$144,000 in cash by GEE		
157	10/15/13	\$102,790	Delivery of \$102,790 in cash by CHEN		
158	10/15/13	\$98,678	Receipt of \$98,678 in cash by LAI		
159	10/23/13	\$134,145	Delivery of \$134,145 by CHEN		
160	10/24/13	\$128,800	Receipt of \$128,800 by LAI		
161	12/5/13	\$199,240	Delivery of \$199,240 by CHEN		
162	12/6/13	\$191,270	Receipt of \$191,270 by LAI		

DATED: _____

FOREPERSON